



United States Department of Justice

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March 5, 2019

Hon. Brenda K. Sannes
U.S. District Judge
Federal Building and U.S. Courthouse
P.O. Box 7336
Syracuse, New York 13261-7336

**In re: Long v. U.S. Immigration and Customs Enforcement
Civil Action No. 5:17-cv-00506 (BKS/TWD)**

Dear Judge Sannes:

In Plaintiff's letter to the Court dated March 4, 2019 (Doc. No. 51), Mr. Keegan wrote "The Court should not permit ICE to so unfairly block and delay development of the record — particularly in a case where the Court held the agency's previous declarations were not entitled to a presumption of good faith. See ECF Doc. No. 32, at 7, 17." [Emphasis added.] The Defendant respectfully requests that the Court review pages 7 and 17 of Your Honor's "Memorandum-Decision And Order" (Doc. No. 32) to ascertain the validity of Mr. Keegan's allegation. As Your Honor will see, nowhere on pages 7 or 17 did the Court find that "the agency's previous declarations were not entitled to a presumption of good faith." On page 7, the Court restated Plaintiff's arguments, and on page 17, the Court held that issues of material fact remain before the Court. Nowhere did the Court find that the agency acted in bad faith or was not entitled to a presumption of good faith.

Respectfully submitted,

GRANT C. JAQUITH
United States Attorney

By: /s/ Ransom P. Reynolds
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